

[Submitting counsel below]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

No. 3:23-md-03084-CRB

**STIPULATION REGARDING
STIPULATED AND [PROPOSED]
PRETRIAL ORDER NO. __: FEDERAL
RULE OF EVIDENCE 502(D) AND
PRIVILEGED MATERIALS**

This Document Relates to:
ALL ACTIONS

WHEREAS, on March 28, 2024, the Court entered a Privileged Materials Order ruling on the Parties’ proposals and disputes regarding how privileged materials will be handled in this multi-district litigation. (ECF No. 366)

WHEREAS, the Court’s order required the Parties to incorporate the Court’s rulings into a “final Stipulated and [Proposed] Pretrial Order No. __: Federal Rule of Evidence 502(d) and Privileged Materials that shall be filed with the Court by April 3, 2024.”

WHEREAS the Parties have complied with this order by drafting and submitting the stipulated and proposed order filed herewith. The Parties have made three non-substantive edits based on what the Parties agree was the Court’s intent (specifically: “work product production”

changed to “work product protection” in paragraph 19; “addresses” changed to “addressees” in paragraph 19(d); and “A Receiving Party make seek...” changed to “A Receiving Party may seek...” in paragraph 19).

THEREFORE, the Parties respectfully request the Court enter the Parties’ proposed order, filed herewith.

IT IS SO STIPULATED.

Dated: April 3, 2024

Respectfully Submitted:

By: /s/ Sarah R. London

Sarah R. London (SBN 267083)

**LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP**

275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: (415) 956-1000
Facsimile: (415) 956-1008
slondon@lchb.com

Rachel B. Abrams (SBN 209316)
**PEIFFER WOLF CARR KANE
CONWAY & WISE, LLP**
555 Montgomery Street, Suite 820
San Francisco, CA 94111
Telephone: (415) 426-5641
Facsimile: (415) 840-9435
rabrams@peifferwolf.com

Roopal P. Luhana
CHAFFIN LUHANA LLP
600 Third Avenue, 12th Floor
New York, NY 10016
Telephone: (888) 480-1123
Facsimile: (888) 499-1123
luhana@chaffinluhana.com

Plaintiffs’ Co-Lead Counsel

Respectfully submitted,

SHOOK HARDY & BACON L.L.P.

By: /s/ Michael B. Shortnacy

MICHAEL B. SHORTNACY (SBN:
277035)

mshortnacy@shb.com

SHOOK, HARDY & BACON L.L.P.

2049 Century Park East, Ste. 3000

Los Angeles, CA 90067

Telephone: (424) 285-8330

Facsimile: (424) 204-9093

PATRICK OOT (Admitted *Pro Hac Vice*)

oot@shb.com

SHOOK, HARDY & BACON L.L.P.

1800 K St. NW Ste. 1000

Washington, DC 20006

Telephone: (202) 783-8400

Facsimile: (202) 783-4211

KYLE N. SMITH (Admitted *Pro Hac Vice*)

ksmith@paulweiss.com

JESSICA E. PHILLIPS (Admitted *Pro Hac
Vice*)

jphillips@paulweiss.com

**PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP**

2001 K Street, NW

Washington DC, 20006

Telephone: (202) 223-7300

Facsimile: (202) 223-7420

Attorney for Defendants

UBER TECHNOLOGIES, INC., RASIER,
LLC, and RASIER-CA, LLC

FILER'S ATTESTATION

I, Michael B. Shortnacy, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

Dated: April 3, 2024

By: /s/ Michael B. Shortnacy
Michael B. Shortnacy